Message

From: Daoud, Elly@DTSC [Elly.Daoud@dtsc.ca.gov]
Sent: 7/17/2017 5:18:21 PM
To: Kuziomko, Joseph [kuziomko.joseph@epa.gov]
CC: Domingo, Danny@DTSC [Danny.Domingo@dtsc.ca.gov]
Subject: RE: ORCR Project regarding OB/OD sites in CA

Flag: Follow up

Hi Joseph,

Please check with Danny Domingo since closure has been referred to CERCLA with our DTSC cleanup unit. For

CA2170023152 NAWS, CHINA LAKE OBOD1 - T RANGE OB 7 6 IT SF 20060725

Thank you,

Elly Daoud
Hazardous Substances Engineer
CAL/EPA
Department of Toxic Substances Control
Hazardous Waste Management Program
Office of Permitting-Sacramento
Ph: (916) 255-3573
FAX: (916) 255-3596
e-mail: edaoud@dtsc.ca.gov

From: Kuziomko, Joseph [mailto:kuziomko.joseph@epa.gov]
Sent: Monday, July 17, 2017 10:05 AM
To: Bailey, Peter@DTSC <Peter.Bailey@dtsc.ca.gov>; Gupta, Nirupama@DTSC <Nirupama.Gupta@dtsc.ca.gov>; Kowbel, Nelline@DTSC <Nelline.Kowbel@dtsc.ca.gov>; Lorentzen, Wayne@DTSC <Wayne.Lorentzen@dtsc.ca.gov>; Singh, Anshu@DTSC <Anshu.Singh@dtsc.ca.gov>; Eshaghian, Mike@DTSC <Mike.Eshaghian@dtsc.ca.gov>; Nieto, Edward@DTSC <Edward.Nieto@dtsc.ca.gov>; Walker, Ed@DTSC <Ed.Walker@dtsc.ca.gov>; Jin, Yujie@DTSC <Yujie.Jin@dtsc.ca.gov>; Coe, Sam@DTSC <Sam.Coe@dtsc.ca.gov>; Shaffer, Matthew@DTSC <Matthew.Shaffer@dtsc.ca.gov>; Largent, Jonathan@DTSC <Jonathan.Largent@dtsc.ca.gov>; Daoud, Elly@DTSC <Elly.Daoud@dtsc.ca.gov>; Becker, Antonia@DTSC <Antonia.Becker@dtsc.ca.gov>
Cc: Shuster, Kenneth <Shuster.Kenneth@epa.gov>; Pena-Molina, Ana <pena-molina.ana@epa.gov>; Kohler, Amanda <Kohler.Amanda@epa.gov>
Subject: ORCR Project regarding OB/OD sites in CA

I am writing to seek information on the closure status of the Open Burn/Open Detonation (OB/OD) units listed below to assist ORCR in a new project to assess closure of OB/OD units. With this information, EPA will be able to identify, evaluate, and document procedures, techniques, and criteria to assess, clean up, and close OB/OD units/sites in a standardized manner.

EPA has been documenting soil and ground water contamination from OB/OD units and the costs to clean them up. Given the inordinate extent of contamination and costs of clean-up that have been reported, we are now seeking to learn more about the monitoring, clean-up procedures, successes, and costs of these efforts. There is currently no national guidance on procedures to assess, monitor, and clean up OB/OD sites, nor metrics to achieve clean closure of OB/OD units. We are requesting information on the clean closure (CC) of OB/OD sites to assist us.

Please first verify the following codes for your facilities in California.

California							
FACILITY_ID	FACILITY_NAME	UNIT_NAME	UNITs	UNIT_DETAIL_SEQ	legal status	operating status	EFFECTIVE_DATE
CA7570024508	BEALE AIR FORCE BASE	OBOD1	4	1	IS	CC	20060613
CAD064573108	SANTA CLARITA L L C	OBOD1-BURN PIT	1	1	IS	CC	19891011
CAD064573108	SANTA CLARITA L L C	OBOD2-DETENATION R	2	1	IS	CC	19891011
CAD064573108	SANTA CLARITA L L C	OBOD3-BURN CAGE	3	1	IS	CC	19950101
CA2570090512	USNASA JET PROPULSION LABORATORY	OBOD1 - IRP OU 5 S	1	3	IT	CC	19971126
CA5213790038	COMMANDER NTC & FORT IRWIN	OBOD1	4	2	IT	CC	19971204
CA7210020676	ORD MILITARY COMMUNITY	OBOD1	2	3	IT	CC	20070921
CAD000626762	PHYSICS INTERNATIONAL COMPANY	OBOD1	1	1	IS	CC	19940630
CAD981393085	FORD MOTOR CO	OBOD1	2	1	IT	CC	19950619
CAD982049439	STANFORD UNIVERSITY	OBOD1	2	1	IS	CC	19960506
CA1570024504	EDWARDS AIR FORCE BASE	OBOD1-EXPLOSIVE ORD. DISPOSAL	2	15	IT	SF	20150313
CA1570024504	EDWARDS AIR FORCE BASE	OBOD2 - PHILLIPS LAB	3	24	IT	SF	20150313
CA3570024551	AIR FORCE REAL PROPERTY AGENCY/CASTLE	OBOD	2	1	IS	SF	19950101
CA2170023152	NAWS, CHINA LAKE	OBOD1 - T RANGE OB	7	6	IT	SF	20060725
CAD000030494	AEROJET ROCKETDYNE INC	OBOD1	2	15	IS	CA	20140116
CA5210020843	SIERRA ARMY DEPOT	OBOD1 (GPRA UNIT)	2	3	IT	CA	20080529
CAD981457302	AEROJET ORDNANCE CHINO FACILITY	OBOD1	4	7	IS	CA	20150914
CA2170023152	NAWS, CHINA LAKE	OBOD1 - T RANGE OB	7	6	IT	SF	20060725
CA6170023208	MARINE CORPS AIR STATION, EL TORO	OBOD1	2	1	IS	IN	19990702
CAD980883847	SRI INTL CORRAL HOLLOW SITE	OBOD1	1	6	IS	IN	19920401
CAT080022148	DENOVA ENVIRONMENTAL INC	OBOD1	2	4	IS	IN	20000623

Questions:

We have a number of questions we hope you can answer regarding your clean closed/closing sites. The operating status of the facilities will determine which sets of questions are to be answered. We understand that some of this data may be difficult to find but we would really appreciate if you could dig it up for us as it will help us move forward with this project and eventually help EPA update OB/OD closing procedures.

Clean Closed (CC) Facilities' questions:

1. Did these sites complete clean closure or are they still in the process of seeking to clean close?
2. Did the state officially certify/approve the unit(s) Clean Closed (CC)?
3. What was the volume of waste disposed, frequency (e.g., daily, weekly, monthly, periodically), and years of operation?
4. Was it OB or OD or both?

5. What sampling procedures were used to identify the extent of the contamination, including kick-out and fallout (e.g., geophysical techniques used to identify buried munitions and fragments; trenching; grid, spokes, meandering way, visual, or random sampling of soil/for kick-out; depth; until no more found; and ground water monitoring)?
6. Were components of the unit removed (e.g., any platforms, pans, pads, and liners)?
7. What clean-up procedures and techniques were used to clean up the contaminants (e.g., excavation, soil sifting)?
8. What data was recorded and metrics used to evaluate the extent and levels of contamination?
9. What criteria was used to certify clean closure (e.g., EPA action levels)?
10. What was the total cost to achieve Clean Closed (CC) status?

Post Closure (PC, CP) Facilities' questions:

1. Why was Post-Closure Permit (PC) or Closed with Waste in Place (CP) status given (e.g., soil and/or ground water contamination)?
2. What was the volume of waste disposed, frequency (e.g., daily, weekly, monthly, periodically), and years of operation?
3. Was it OB or OD or both?
4. What sampling procedures were used to identify the extent of the contamination, including kick-out and fallout (e.g., geophysical techniques used to identify buried munitions and fragments; trenching; grid, spokes, meandering way, visual, or random sampling of soil/for kickout; depth; until no more found; and ground water monitoring)?
5. Were components of the unit removed (e.g., any platforms, pans, pads, and liners)?
6. What clean-up procedures and techniques were used to clean up the contaminants (e.g., excavation, soil sifting)?
7. What data was recorded and metrics used to evaluate the extent and levels of contamination?
8. What criteria was used to determine that clean closure could not be achieved (e.g., EPA action levels)?
9. What was the total cost to achieve closed status?

Inactive/Closing, but Not Yet RCRA Closed (IN) and Corrective Action and Superfund (CA, SF) Facilities' questions:

1. Are these units seeking to clean close?
2. If so, what criteria is being used to attempt clean closure (e.g., EPA action levels)?
3. What was the volume of waste disposed, frequency (e.g., daily, weekly, monthly, periodically), and years of operation?
4. Was it OB or OD or both?
5. What sampling procedures are being used to identify the extent of the contamination, including kick-out and fallout (e.g., geophysical techniques used to identify buried munitions and fragments; trenching; grid, spokes, meandering way, visual, or random sampling of soil/for kick-out; depth; until no more found; and ground water monitoring)?
6. Were components of the unit removed (e.g., any platforms, pans, pads, and liners)?
7. What clean-up procedures and techniques are being used to clean up the contaminants (e.g., excavation, soil sifting)?
8. What data is being recorded and metrics being used to evaluate the extent and levels of contamination?
9. What is the total cost to date to remediate the site?

We plan to have a contractor gather this information on a select number of sites from the states. The purpose of this current effort is to gather information on the status of cleanup at these sites to help us identify which sites have the best information for our contractor to follow up with. Thus, for this effort, we seek answers to questions 1-4 and the last question in each set, and for the remaining questions we seek whether or not good information exists to answer these questions. We hope to receive this information by July 31st. Thank you for taking time to assist us with this project. If you have any questions, please feel free to reach out to us. Any information that you may be able to provide will be helpful in our project.

Sincerely,

Joseph Kuziomko
703-347-8168

U.S. EPA Headquarters
Two Potomac Yard
2777S. Crystal Drive
Arlington, VA 22202-3553